

**AFFIDAVIT
OF
MATTHEW W. SPRINKLES
TASK FORCE OFFICER
BUREAU OF ALCOHOL, TOBACCO, FIREARMS & EXPLOSIVES**

I, Matthew W. Sprinkles, being first duly sworn, do hereby depose and state:

1. I am a federally deputized Task Force Officer (TFO) of the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF) assigned to the Kansas City, Missouri Office. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516(1). I have been a Task Force Officer (TFO) of the ATF since April 2013. I also work as a Detective/Police Officer with the Sedalia, Missouri Police Department (SPD), and have been with the SPD since July 2006. During my career as a law enforcement officer, I have participated in numerous drug investigations, either as a case agent or in various support roles at both the state and federal level. I have received specialized training on the subject of firearms, narcotics trafficking, and money laundering from the ATF and other law enforcement entities, and have been personally involved in investigations concerning firearms and the possession, manufacture, distribution and importation of controlled substances, as well as methods used to finance drug transactions.

2. I write this affidavit in support of criminal complaint for JON MARK WILSON, date of birth: January 10, 1964, for use for interstate commerce facilities in the commission of murder for hire, in violation of Title 18, United States Code, Section 1958.

3. The information contained in the affidavit is either personally known to me, or represents the collective knowledge of the investigating team and others.

4. On January 11, 2019, MSHP Trooper Morey and I met with an MSHP confidential source (CS), who advised that WILSON had solicited him/her to arrange a murder for him. The CS said that WILSON had recently been arrested for child molestation and related offenses by the Sedalia Police Department. The CS stated that WILSON wanted to avoid prosecution by having the victim, N.C., who is now an adult, murdered. The CS agreed to record a conversation with WILSON, and then introduce an undercover agent to WILSON. At approximately 5:16 p.m., I gave the CS an activated recording device, and checked the CS for contraband. The CS had no contraband weapons or drugs. The CS departed the meeting location and traveled to 816 Manor Court. Surveillance was established in the area of WILSON's residence.

5. At approximately 5:25 p.m., ATF TFO Joseph McCullough observed the CS arrive at 816 Manor Court and meet with WILSON. I observed WILSON talking to the CS through the driver's window of the CS' vehicle. The CS and WILSON began talking about a business venture that the CS needed investors for and then quickly changed the subject to the murder of N.C. WILSON said, "The only thing is, I got to, um, to pay off her cousin first. And see if this happens pretty quick then I don't have to pay for depositions and shit." The CS told WILSON that the person he was going to hire for the murder (undercover agent) was coming from Ohio, and that it was up to WILSON how it goes. WILSON responded, "It's the only choice I got." WILSON then said, "At least she didn't show up for court the other day, which is cool." The CS believed WILSON said "he" referring to the victim. WILSON said, "She didn't," referring to WILSON's ex-wife who is the mother of the victim, N.C. The CS then asked, "Did he" referring to N.C. coming to a court hearing. Jon responded, "No, he hasn't yet." WILSON stated, "And I swear I see him driving by here several times. I'm pretty sure I caught him on camera at least once." WILSON continued, "Yeah, in that, in his Camaro. Another thing I thought of, if there is any way

you can do like a carjacking, swipe his fucking car and part it out. He's got a killer stereo in there, that's what caught my attention was the stereo. I don't hear cars like that driving down the street. I look out the window and this black Camaro drive by. As far as I know he's got a pretty nice black Camaro, fancy wheels, swipe his fucking car, make it look like a carjacking and then part his car out for money. . . If you had a car hauler that you could just immediately dump his car into a car hauler and drive off and." WILSON began discussing his court hearings and then told the CS, "But, this is also where he's gonna start doing depositions which are a thousand dollars a pop, coming out of my pocket . . . So I've got eight thousand (\$8,000) saved up for that and we've already started paying her cousin back, so, I just think I, I think you guys doing that business, would be a great idea." The conversation quickly turned to the CS' business idea and weekend plans as if someone came outside and could hear the conversation. At approximately 5:37 p.m., the CS and WILSON separated and the CS departed the area. Trooper Morey and I followed the CS to the pre-determined meeting location for debrief. Trooper Morey searched the CS and his vehicle again, and did not locate any contraband items. I collected the recording device and deactivated it. During debrief, the CS' account of the conversation matched the recorded conversation. The recording was copied to a DVD and placed into evidence in the ATF KCII evidence vault.

6. On January 16, 2019, SA Redies, Trooper Morey and I met with the CS. Trooper Morey conducted a search of the CS and the CS' vehicle and did not locate any weapons or drugs. SA Redies and the CS discussed traveling to WILSON's residence for a murder for hire scheme, in which it was anticipated WILSON would solicit SA Redies to murder N.C. in exchange for payment. SA Redies and the CS drove to WILSON's residence. Prior to arrival at WILSON's residence, SA Redies activated audio and video recording devices to capture the meeting with

WILSON. An audio recorder/transmitter was activated and provided to the CS. SA Redies and the CS drove to WILSON's residence located at 816 Manor Court, Sedalia, Missouri, and arrived at approximately 1:19 p.m. SA Redies, acting in an undercover capacity, and the CS exited the vehicle they were occupying and walked to the front door of the residence. WILSON opened the front door, and the CS and SA Redies walked inside the residence. Conversation occurred between the CS and WILSON, and then the conversation shifted to WILSON and SA Redies. SA Redies told WILSON, "He said you might need some help with something." WILSON replied, "Yeah, I do," . . . "Unfortunately, I think I do." . . . "I'm looking at maybe life in prison." WILSON continued, "It's my ex-wife and her step, her, her boy and he's accusing me of shit and she's in, she's extorted five thousand dollars out of me already. Yeah, she showed up a year ago at my front door. She's just a fuckin' bitch, man, this, this chick is hard." WILSON added, "And she showed up wanting money from me and when I wouldn't give it to her she came back and said if you won't give me money I'm going to tell them you molested my son." WILSON continued, "Not wanting to cause problems into my life and my family I gave her five thousand dollars." WILSON said, "It was good for about a year, and ah, we ran into her at a restaurant one night, and she came, within two days, she came back wanting more money." WILSON stated, "They had me arrested and shit," and "When I turned her down the next time she had me fuckin' arrested." SA Redies asked, "So what cha you talk, so what cha you want done?" WILSON responded, "I'm afraid, I'm want her kid taken out, because he's the one who's putting a complaint against me." SA Redies asked, "Okay. So when you mean taken out, you want him?" WILSON said, "Yep." SA Redies clarified, "You want him dead?" and WILSON replied, "Yeah. I don't know what else to do. I don't have any other choice. My lawyer's not give me a whole lotta hope with all this shit, this me too crap that's going on."

7. SA Redies replied, "So, ah, that don't come free you know." WILSON said, "I know." SA Redies asked, "What ah you thinking it's worth?" and WILSON responded, "My life." WILSON continued, "Because of what's happened to me, I've already had to take out a loan with family for twenty thousand dollars." WILSON further stated, "I've got to pay my family off first." WILSON said, "[The CS] said that s/he may have a way to at least give you something for right now and, and it'll at least take care of this and then however, however, it works out." SA Redies asked, "Well how much are you going to give me for right now?" and WILSON responded, "Well that's, I don't know, what did you," WILSON turned toward the CS and SA Redies interrupted, "This, this is us, okay. I don't want him involved, he's, he's a friend, okay, and I don't want him to get hemmed up in anything." SA Redies stated, "It's is just me and you." WILSON said, "Yeah." SA Redies asked, "After today, it's just you and me talking, okay?" WILSON said, "Yep." WILSON added, "The less I know the better." SA Redies asked, "How much is this worth, you know, up front?" WILSON responded, "Not to bring [the CS] in, but s/he said something about that s/he had a truck that you might be interested in, is that still?" SA Redies said, "I'm interested in cash, man." WILSON reiterated, "You're interested in cash." SA Redies repeated, "I'm interested in cash." WILSON said, "I don't have anything, that's the problem, that's, that's, that's where I'm fucked." WILSON said, "We're trying right now to figure out how to take out another personal loan to pay her cousin back." WILSON continued, "And my wife being an accountant, she's up on all the money that we got, and if any kind of money disappears, she's gonna, want ta know what happened to this money." WILSON added, "That's the problem that I'm in right now is." WILSON said, "I do have some." SA Redies asked, "How much is some?" and WILSON replied, "A couple thousand dollars." SA Redies asked, "So you could pay me a couple thousand up front and then you could pay me, I mean, after it's done, after I kill him, you

could pay me, you know, another five?" WILSON answered, "Yeah." SA Redies queried, "Could we work that out?" WILSON said, "Yeah. Again, it would have to something, it would have to be something, not larger chunks of cash." SA Redies asked, "Like a payment plan?" WILSON responded, "Yeah. I know, I know, I know." SA Redies said, "I figure that if, you know if you can get a couple grand together, and you can meet me, I'll be coming back through the city on my route."

8. WILSON said, "Here's something else that I mentioned to [the CS]," "I have no idea what you're thinking as far as whatever." The CS said, "You talking about getting rid of the body, is that, is that what you're talking about." WILSON responded, "Yeah." The CS stated, "Making it not look as obvious as a murder?" WILSON stated, "Yeah. I mean, yeah." SA Redies said, "Well I'm not going to walk up to the dude in the street and shoot him, you know, that doesn't work out very good because then people know." WILSON replied, "Right, right." SA Redies asked, "Do you have a certain way you want him killed?" WILSON responded, "Just so that it doesn't look like I had anything to do with it." SA Redies said, "Right, but, I mean do you want me to shoot him in the face or what?" SA Redies continued, "Different people have things that they want done, so I mean, I'm doing the service for you." WILSON said, "I appreciate that." SA Redies stated, "And you know you're employing me to do this, right?" WILSON replied, "Mm hmm." SA Redies added, "Since you're paying me I want to do what you want done, 'cause I don't want you to come on the back end and say well you didn't do this right and I'm not going to pay you." WILSON answered, "Oh, no." SA Redies continued, "That sucks for me, 'cause then I only get, you know, whatever you gave me initially." WILSON said, "Well no, 'cause now you know where I live . . . and I respect that I mean, you're, you're putting your life on the line for me, and you don't know me from fucking Adam."

9. SA Redies stated, "I don't want to meet back here after today, and continued, "Me and you, the next time we meet, what I want to do is I want to meet up at the Legends . . . Up in KCK, off of 70 there . . . I'm going to give you phone number, that ah, it don't come back to me, you know . . . We'll meet up there next Tuesday." WILSON said, "My whole wife thing too, well, and I got to be honest with you, she made a comment at fucking Christmas time about taking him out, and I was really surprised about that." WILSON continued, "My wife's not an angel, she, I don't want her knowing anything about it either."

10. SA Redies said, "Next Tuesday is ah twenty-second . . . I mean does that work for you or does another day work better?" WILSON asked, "That's a three hour trip, right, up there and back?" SA Redies answered, "Yeah . . . We ain't got to talk long, you give me my money, and you get me, I need a photograph of this guy . . . And I need to know where is that he lives . . . Now does he live with anybody?" WILSON said, "Yeah, he lives with his wife or girlfriend, they do have dogs . . . They're out in the country, in the middle of fuckin' nowhere." SA Redies responded, "Perfect, because I can kick in that back door, and just make it look like somebody happened to be home whenever I was breaking in and burglarizing it." WILSON replied, "Okay." SA Redies added, "I was going to steal from them and somebody happened to be home so they got shot. Ain't no po dunk cops gonna think nothing about that." WILSON said, "As far as I know the kid is a fuckin' drug dealer too." SA Redies asked, "Can you get an address?" and WILSON replied, "I have an address." WILSON asked, "You want it right now?" and SA Redies responded, "Yeah, sure, if you got it, give it to me, right now, that way I can start looking at things I need to do." WILSON walked across the kitchen, obtained a large white envelope, then walked back across the room. WILSON opened the envelope and removed the papers. SA Redies observed some of the papers inside the envelope appeared to contain legal documents and/or police reports.

Pertaining to the papers, WILSON stated, "This is all, this is all on the shit paperwork for that little fucker." WILSON added, "I would like her killed too, but I don't have the money, and it would definitely look, it would definitely look bad if both of them went." SA Redies asked, "Does he work anywhere?" and WILSON responded, "As far as I know he's a janitor at our high school, or our junior high."

11. Referring to the payment for killing N.C., SA Redies stated, "I'm willing to take your word that you'll hit me on the backside on some stuff, but I gotta have something up front, you know, to show you're real." WILSON said, "I know, I know." WILSON added, "I don't know how long it'll take me to give you the rest of the money." SA Redies asked, "But you're giving me your word you're going to pay me though, right? WILSON responded, "Absolutely." SA Redies asked, "You said you can come up with two grand, right?" WILSON answered, "Yes." SA Redies asked, "Is that a problem?" WILSON responded, "It's in my bank account right now, and I don't know if two thousand dollars drops off my bank account if somebody's going to ask me what happened to it, if they look at my bank account. I'm so worried about that shit." The CS asked WILSON, "Could you say you loaned it to me?" WILSON responded, "Again, I got to fucking deal with my own wife which is sometimes as bad as the fucking cops." The CS said, "If [your wife] would ask you could tell her that, you know, that you loaned it to me, to get this, you know, get this started, you know, on my business level, you know, you could, you could tell her that." The CS added, "But that's between you two."

12. WILSON wrote on a piece of small notebook paper N.C.'s name, and stated the name N.C. as the individual he was soliciting SA Redies to kill. WILSON also wrote the address, "21098 little muddy ln Sedalia" on the same paper. WILSON gave the piece of paper to SA Redies, who instructed, "Just get me a picture, I don't care how, I just don't want it to be the wrong

person.” WILSON responded, “That seriously, that wouldn’t do me any good.” SA Redies commented, “No or me.” WILSON agreed, “Right.” SA Redies said, “Cause you’re only paying for one right now.” WILSON said, “I’m hoping she’s unstable enough that once he’s gone she’ll kill herself, is what I’m shooting for.”

13. SA Redies asked, “So does that work for you, if I go in there, make it look like I was there to rob ‘em, somebody happened to be home, and they got shot?” WILSON acknowledged, “Yeah.” SA Redies added, “As long as they’re dead, you don’t care?” and WILSON said, “I don’t care.” WILSON asked, “You’d actually take some shit too then?” and SA Redies replied, “I’d make it look real.”

14. SA Redies said, “I don’t want to travel all the way from where I got to come from, you know, with a gun. . . . You got anything or you know anybody that’s got anything that’d be short enough? . . . I prefer, if I can, to use shotgun, close impact, it works well, and it kills somebody.” WILSON replied, “I’ve got two guns but they’re both registered to me.”

15. SA Redies stated, “And if you don’t want me to do this, you gotta tell me.” WILSON said, “I don’t have a fuckin’ choice. I can’t go to fuckin’ prison. I about died spending five days in jail.” SA Redies said, “Okay, but at some point you decide, no, I really don’t want this, you gotta tell me. Now hey, if you pay me, and then you get cold feet, that’s on you, that’s not on me.” WILSON said, “I understand.” SA Redies continued, “No hard feelings there, but you know, that’s again, that’s on you.”

16. WILSON asked, “You want eight all together? Eight thousand?” and SA Redies replied, “Two and five” (meaning two thousand up front, and five thousand afterward). WILSON said, “Okay . . . I get enough telemarketer things that you know, if we keep numbers short or conversations short and sweet. I definitely wouldn’t do any kind of text messaging.” SA Redies

responded, "I'm not going to do any text messaging . . . You call me if ah, you're not good, you know, with ah, something." WILSON said, "Here's the deal, right now, it's too the point where they want to start their depositions and each one of them sons of bitches costs a thousand dollars apiece."

17. SA Redies asked, "What's your number 'cause I'm going to call you with mine?" WILSON responded, "Six six oh two eight one one seven six seven (660-281-1767)." SA Redies dialed that number from his telephone, and asked WILSON if he got the call. WILSON said, "Yeah," and SA Redies heard a telephone WILSON had making musical sounds.

18. WILSON stated, "I've done nothing but think about this . . . And what to do if the police come to my door . . . And what to do if she comes to my door." SA Redies responded, "You don't know me, that's one thing, and I don't know you. Okay?" WILSON replied, "Yep." SA Redies asked WILSON about providing him a firearm to commit the murder. SA Redies asked WILSON what firearms he had. WILSON said, "One's a nine and one's a forty-five." SA Redies responded, "It'd be the forty-five." WILSON said, "See, technically that's in [my son's] name . . . That's my son. I don't want him to be implicated in anyway." SA Redies replied, "If there's a way you can get ahold, a forty-five would work . . . A shotgun preferably, a, ah, something shorter . . . That messes people up and, you know, people don't come back from that . . . I can't resurrect nobody, I ain't Jesus." WILSON responded, "Again, the bitch is fucking evil, her kid, I thought was a decent kid, but the fact he's doing this shit to me, it just, it baffles my mind."

19. SA Redies instructed, "You meet me next Tuesday." WILSON agreed, "Alright." WILSON asked the CS to go with him. SA Redies indicated, "I'd rather me and you. Just me and you." WILSON said, "Okay." SA Redies and WILSON agreed to meet at Cabela's in Kansas City, Kansas. WILSON said it would be after lunch, that his wife would come home from one to

two, "I could drive up there and be back before she got off work at five o'clock." SA Redies said, "Just bring me my money, bring me a photograph . . . If you got any other information about what, anything you find out between now and then and then ah, that's all I need to see you for man, I'll take care of the rest." WILSON said, "Alright."

20. SA Redies stated, "And then I'll call you when it's done." WILSON said, "Okay." SA Redies said, "And then I'll get ahold of you down the road, and see if you got the rest of the money." WILSON said, "I hate to ask 'cause it sounds so fucking stupid, but can we do so sort of payments?" SA Redies responded, "That's what I mean, you pay me later. I mean, you're paying me two thousand now, right?" WILSON replied, "Yeah." SA Redies said, "Okay, that's going to take care of my expense up front so that's why you're going to pay me down the road." WILSON agreed, "Okay."

21. Referring to the intended victim, N.C., SA Redies asked, "How old is this dude?" and WILSON responded, "Twenty-four." SA Redies asked, "Is he big guy, little guy?" and WILSON replied, "He's smaller than I am . . . Super short, shorter hair than I got . . . semi-Mexican looking 'cause his mom's Mexican, half Mexican."

22. SA Redies and WILSON agreed to meet at 3:30 p.m. on Tuesday, January 22, 2019. WILSON said, "I just can't think of anything else to do. I can't go to fuckin' prison, there's no fuckin' way." SA Redies and WILSON shook hands. SA Redies and the CS departed the residence at approximately 1:53 p.m. After leaving the residence, SA Redies obtained the recording device from the CS and stopped the recording. SA Redies and the CS departed ways.

23. SA Redies captured the audio and video recordings on four (4) DVDs. The DVDs were recovered as evidence, and assigned ATF Property and Evidence Item number E-000002.

SA Redies also recovered the handwritten note with the name "N.C." as evidence. The note was photocopied and assigned ATF Property and Evidence Item number 000002.

24. On January 22, 2019, the CS contacted Trooper Morey, and indicated that WILSON had some questions about the logistics of the meeting with SA Redies. It seemed as if WILSON was unsure if he was supposed to contact SA Redies or that SA Redies was to contact him. At approximately 11:00 a.m., SA Redies contacted WILSON using telephone number (660) 281-1767, asked WILSON if he was still available to meet in Kansas City, Kansas, and if he had everything for the meeting. WILSON agreed that he would be at the meeting, and that he had what he agreed to bring (\$2,000). SA Redies and WILSON agreed that WILSON would be at the meeting at 3:30 p.m. WILSON said he would leave as soon as his wife finished her lunch break and went back to work. SA Redies made this call from the Cenex gas station located at 4732 State Avenue, Kansas City, Kansas.

25. At approximately 1:25 p.m., surveillance was established near WILSON's residence. I observed WILSON turn onto South Grand Avenue from Manor Court in Sedalia, Missouri, at approximately 1:29 p.m. WILSON was driving a red Toyota Tacoma bearing Missouri registration 7NB678. WILSON traveled to Missouri Bank II located at 1601 South Limit Avenue in Sedalia, Missouri. I observed WILSON go through the drive through teller window. Trooper Greg Primm and I identified WILSON as the driver. After leaving Missouri Bank II, WILSON traveled to Cabela's located at 10300 Cabela Drive in Kansas City, Kansas. WILSON arrived at Cabela's at approximately 3:36 p.m.

26. At approximately 3:39 p.m., WILSON got into SA Redies' vehicle and began discussing the murder for hire. WILSON supplied SA Redies with a picture of N.C. standing next to his car and stated the picture came from Facebook. WILSON then told SA Redies that N.C.

still looked similar to the photograph. SA Redies asked WILSON if he still wished to go through with the murder. WILSON responded by saying he felt he had no other choice. WILSON then handed SA Redies two thousand dollars in U.S. currency and it was counted out. WILSON and SA Redies discussed the payment plan for the remaining five thousand dollars for the murder. WILSON agreed to pay SA Redies part of the money around the Fourth of July and the remainder around Christmas. SA Redies then asked WILSON if he would go into Cabela's and purchase shotgun shells for the murder. WILSON agreed and exited SA Redies' vehicle and was observed by ATF SA Matt Wilson entering the store. TFO Joseph McCullough followed WILSON into the store, and observed him select shotgun shells and purchase them. TFO McCullough then observed WILSON exit the store. TFO Chase Jackson then observed WILSON get back into his vehicle and drive to SA Redies' location. I then observed WILSON get back into SA Redies' vehicle. WILSON gave the shotgun shells to SA Redies and described how he wiped his fingerprints off the box. The shotgun shells were Herter's brand 12 gauge shells. There were 25 shells in the box. WILSON said he threw the receipt in the trashcan. SA Redies and WILSON then discussed how they would get in contact with each other when payment was due for the remaining debt. SA Redies agreed to contact WILSON using a new phone with an Ohio area code.

27. WILSON exited SA Redies' vehicle and I observed him depart the area. Surveillance followed WILSON away from the area and maintained surveillance until he was stopped by MSHP Trooper Aaron Craig just west of LaMonte, Pettis County Missouri. WILSON was transported to the Sedalia Police Department where I met with him in the interview room of the Sedalia Police Department. I asked WILSON if he knew why he was arrested and he said he did not, then stated that he wished to speak with his attorney. WILSON asked for an attorney

before I read him his *Miranda* warning. Trooper Morey and Trooper Dan Bickell then transported WILSON to the Cole County Jail for holding.



Matthew W. Sprinkles
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to and subscribed before me, on this, the 23rd day of January, 2019.



Willie J. Epps
United States Magistrate Judge